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Dear Mr. Bob Zeigler,

I am writing to provide comments on behalf of my organization and our 4,500 membership households on the Determination of Nonsignificance (DNS) 13-082: Whiskey Dick Wildlife Area Seasonal Road Closure. We strongly feel that all information, including that in your own SEPA checklist provided with the DNS documentation, indicates that the winter closure as it has been defined from 2008-2013 contributes both to the health of the Colockum elk herd and their movement patterns involving potential conflicts on private lands. We see absolutely no ecological indication or study that states an increase in disturbance during winter would be neutral to the elk herd or other species using this area such as bighorn sheep and greater sage grouse, but instead we read that this herd is already below population objectives overall and facing multiple threats to their health notwithstanding lack of habitat removed from human disturbance. We also recognize that your department in collaboration with the Washington Department of Natural Resources is publicly involved in a collaborative planning effort to determine the longer term management plan for this landscape including the balance for providing recreation and habitat values for this herd. Therefore, it seems an inappropriate time to alter the existing and effective ongoing management trend of winter closures in anyway prior to completion of this planning effort. Within the Naneum Ridge to Columbia River planning process, we have only seen evidence through the analyses being prepared by your agency that show the Colockum elk herd population requires greater access to habitats without human disturbance in all seasons, rather than any indication that human use in this area should be expanded upon.

Therefore, we believe that the opening of the road that bi-sects the 44,000 acre winter closure area running from the Quilomene Ridge Road to Gingko State Park area is significant and the DNS should be withdrawn. We suggest instead that you maintain the winter closure for the Quilomene area to motorized recreation as it has been since 2008 without the opening of this road, and allow the question of whether or not to open the road and expand access to be answered through a thorough analysis and public process within the Naneum Ridge to Columbia River Recreation Planning process. Our rationale for this position is expanded upon below.

Expanded winter use contradicts existing studies, land management priority for wildlife, and Colockum elk herd management plan

Your DNS letter states that the management goals for the LT Murray/Quilomene/Whiskey Dick Wildlife Areas “are to preserve habitat and species diversity for both fish and wildlife resources, maintain healthy populations of game and non-game species, protect and restore native plant communities, and provide diverse opportunities for the public to encounter, utilize, and appreciate the wildlife and wild areas.” This builds on the history that the Colockum, Quilomene, and Whiskey Dick areas were purchased specifically to provide “big game winter range and upland bird habitat, and also to provide diverse wildlife related recreational opportunities such as hunting, fishing, and wildlife viewing.” It is clear from this history and policy language that the primary purpose for all management decisions is to ensure healthy wildlife, especially game species, and then to provide recreational opportunities to enjoy the land and the healthy populations. Although the last 5 years of season closures appear to be contributing to a trend of a healthier herd, the following statements about the herds health contradict the idea that they are in a state where additional disturbance could be considered:

- January 2013¹, “Most Colockum cow elk were in modest to marginal physical condition entering winter.... Data for Colockum elk (and Yakima elk) clearly demonstrate that wintering elk in this region are in marginal physical condition during the mid to late winter period (energy stores are low)
- January 2013², in a Yakima Herald article interviewing WDFW staff it was stated regarding the closure that “Preventing elk from going where you don’t want them to go is probably one of the less common reasons....A bigger reason, he said, was to minimize disturbance to elk whose body-fat content is down to a surviveable minimum after a fall spent avoiding hunters and finding diminishing forage as the winter approaches. The average body fat for Colockum elk females in the early fall is roughly 15 percent. By the end of the winter that can be below 4 percent. Most of the cows are in pretty modest condition in the winter,” McCorquodale said. “They’re not ready to fall over and die, but they’re pretty lean. I think one of the best reasons to contemplate some kind of closure or restriction on access during the winter is just that those elk, we’ve harassed them pretty much all fall.”
- February 3, 2012 (PDF presentation) “Bull Management....Spring Bulls Ratio..chronically below objective.”

Additionally, statements from your agency affirm that the closure has been effective rather than neutral or ineffective meeting the goals of this land and this herd including statements such as:

- January 2013 (same presentation as above), “Closure wintering elk use was closer to roads than use for non-closure elk, reflecting the availability of habitat distant from roads.... Closure wintering elk appeared to become less sensitive to road effects during the closure period; not so for non-closure wintering elk.”
- December 2013 in the DNS public letter on this management proposal it states, “With implementation of the seasonal motorized vehicle restriction, hunting

¹ http://wdfw.wa.gov/conservation/elk/colockum/jan0713_colockum_elk_presentation.pdf

² <http://www.yakimaherald.com/sports/outdoorandrecreation/707322-8/study-food-search-drives-colockum-elk-herd>

restrictions and other management actions, private land damage complaints have decreased, total herd size has increased, the herd size in the southern portion of the winter range has increased, and antlerless harvest opportunities have been partially restored. Not all of these positive trends can be attributed to the restriction of motor vehicles, but it has been one of several related management actions.”

The latest version of the Colockum Elk Management plan recognizes the need for managing access and human disturbance year round to ensure a healthy herd, while also addressing conflicts due to movements onto adjacent land. The plan states that the impact from human use occurs not only on the road but an influenced zone around it, “Peek et al. (2002) in a report to the Washington Fish and Wildlife Commission stated ‘Most authorities recommend restrictions in human activity to reduce displacement and energy loss in winter.’.... Powell and Lindzey (2003) found elk avoid areas within 1.2 miles of major roads in summer and 0.6 miles in winter in open habitat in Wyoming.... An effective strategy for elk is to fatten up in the fall, then conserve energy during the winter. On winter range, habitat improvements may be helpful, but limiting disturbance so elk make more effective use of existing forage may be more critical.”

On February 3, 2012 (PDF presentation) your staff stated in a presentation that “Having minimal area unaffected by road influences on a landscape would be expected to perpetuate the kinds of management challenges currently faced in the Colockum.”

Lack of capacity to monitor unauthorized use off of the newly opened road

The DNS letter and SEPA checklist recognize that the opening of a through road would “require increase enforcement” to ensure that not only are people obeying the closure of the remaining Green Dot roads, but also not conducting any unauthorized use off of the through road. The road also required action by Washington State Parks Department, who has closed many parks due to lack of capacity to maintain or ensure enforcement of their facilities. We note that your agency has also received many budget reductions, and find concern with the lack of description in a finding of no-significance with the ability of your agency to manage legal use in this area that faces increasing human pressure.

Recreational access is maintained with the closure, and public opinion by user groups support the closure

The DNS letter states that WDFW’s mandate is to “preserve, protect and perpetuate fish, wildlife, and their habitats, and to maximize sustainable wildlife-related recreation.” Motorized recreation will continue along the periphery of the closure area on through roads that remain open, while we would assert that “wildlife-related recreation” that the department is mandated to promote in balance with the health of the landscape and species is not only maintained by likely expanded with a full seasonal closure that does not include the opening of a through road. Skiing, snowshoeing, photography, and wildlife viewing are all still permitted during the full closure and may be improved with the solitude afforded during this season. We would also note that the health of the herd is directly related to the quality of the hunting season, and certainly providing the most effective winter security habitat that the department can ensure on our public lands contributes to that “wildlife-related recreation” as well.

Your own SEPA checklist states that an “overwhelming majority” of all types of hunters support using road closures to maintain healthy game populations during critical periods of the year. Past documentation for these winter closures released by your agency state that the closure as it was presented from 2008-2013 was exactly for these purposes. In a 2012 news release on this closure, your agency stated “Continuing to track elk this winter will help us judge the effectiveness of the closure....Based on data we’ve previously collected, we would recommend permanent seasonal vehicle closure.” It went on to re-affirm that “Research from across the western United States indicates vehicle traffic can disturb elk and significantly reduce their use of habitat near roads....The zone influenced by roads can be quite large in open areas such as the Colockum elk winter range.”

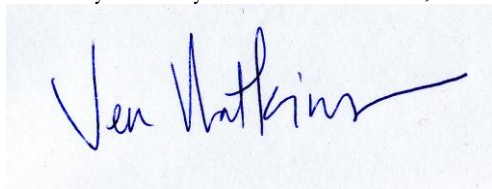
Conclusion

We understand the multiple uses that our public lands provide, and our staff and members utilize the planning area not only for work but recreation. However we strongly believe that we must present a balanced system of access with sustaining our natural resources including fish and wildlife populations over time, and that all decisions identifying that system should be well informed by science as well as social desires. There is a greater need than ever for our public lands to evaluate their role in providing healthy watersheds and wildlife habitat due to increasing development pressure on adjacent private lands, annual habitat impacts both positive and negative from fire seasons, a growing recreating public. In addition to those existing issues, we must consider the anticipated impacts from a changing climate not only impacting our natural resources but increasing the vulnerability of our transportation and recreation system.

We urge you to withdraw the DNS and maintain the existing winter closure that has been in place since 2008, while allowing a robust dialogue and analysis to continue in the Naneum Ridge to Columbia River Planning Process to guide future management in this area.

Please contact us with any questions regarding these comments and to continue the dialogue. We would only add that following the legislative interference with the outcomes of the collaborative Naneum Ridge to Columbia River Planning Process, it is all the more important that your decisions allow for quality public input as well as are based on science to ensure they meet the mandates of your agency.

Thank you for your consideration,



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CC:
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